

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RICHARD P. by and for	)	No. 03-390 Erie
RACHEL P. and DENISE L. by	)	
and for KRISTINA L.,	)	
	)	ELECTRONICALLY FILED
Plaintiffs,	)	
	)	
v.	)	<b>Jury Trial Demanded</b>
	)	
SCHOOL DISTRICT OF THE CITY	)	
OF ERIE, et al	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR AN ENLARGEMENT OF TIME  
TO RESPOND TO DEFENDANTS' SUMMARY JUDGMENT MOTION**

1. Defendants have filed a summary judgment motion.
2. Plaintiffs' summary judgment is due August 31, 2005.
3. Plaintiffs' counsel will be on vacation from August 18<sup>th</sup> through the 27<sup>th</sup>.
4. Prior to that time, Plaintiffs' counsel must file a pretrial statement in the case of Stacy S. et al. v. Girard School District, et al., pending before this Court, and a brief to the United States Court of Appeals for the Third Circuit in another case, which is due on August 22, 2005.
5. Plaintiffs request a ten-day enlargement of time to file the response to Defendants' summary judgment motion, or until September 12, 2005.
6. Defendants' counsel does not oppose this request.

7. The additional ten days should not disrupt any significant dates of the case management order of this case.

WHEREFORE, Plaintiffs request this Court permit them to file the response to Defendants' summary judgment motion on or before September 12, 2005.

Respectfully submitted,

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SCHOOL DISTRICT OF THE CITY	)	
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	)	
Defendants.	)	

**ORDER OF COURT**

IN ERIE, this the \_\_\_\_ day of \_\_\_\_\_, 2005, upon the foregoing Motion, it is hereby Ordered that Plaintiffs shall have until September 12, 2005, to respond to Defendants' summary judgment motion.

\_\_\_\_\_  
U.S. District Court Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will sent notification of such filing to the following:

James T. Marnen, Esquire  
KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.  
120 West Tenth Street  
Erie, PA 16501-1461

S/ Edward A. Olds

Edward A. Olds, Esquire